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10 Attorneys for Defendant  
11 KEUN TAEK PARK

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 TOPPAN PHOTOMASKS, INC.,  
16 Plaintiff,  
17 vs.  
18 KEUN TAEK PARK, an individual,  
19 Defendant.  
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Case No. 3:13-cv-3323 MMC

STIPULATION AND ~~[PROPOSED]~~  
ORDER MODIFYING PRETRIAL  
PREPARATION ORDER

Complaint Filed: July 17, 2013  
Trial Date: April 20, 2015  
Judge: Hon. Maxine M. Chesney

# STIPULATION

Plaintiff Toppan Photomasks, Inc. (TPI) and Defendant Keun Taek Park (collectively “the Parties”), have been engaging in settlement talks since their last phone check-in with Magistrate Judge Corley on May 22, 2014, and progress is being made toward resolving this matter. In order to facilitate further settlement discussions, the Parties stipulate and request that the following dates in the Pretrial Preparation Order (Dkt. No. 53) and Stipulations and Orders Regarding Discovery (Dkt. Nos. 77 & 86) be modified as follows:

- Non-Expert Discovery Cutoff extended from July 11, 2014 to September 12, 2014;
- Designation of Experts extended from August 1, 2014 to October 3, 2014;
- Designation of Rebuttal Experts extended from August 29, 2014 to October 24, 2014;
- Expert Discovery Cutoff extended from August 29, 2014 to November 14, 2014;
- Dispositive Motions filing deadline extended from September 19, 2014 to December 19, 2014;
- Meet and Confer (Civil Local Rule 16-10(b)(5)) extended from December 9, 2014 to March 3, 2015;

The Pretrial Conference Date remains April 7, 2015 at 3:00 pm and the Jury Trial Date remains April 20, <sup>2015</sup>~~2014~~ at 9:00 am, Courtroom 7, 19<sup>th</sup> Floor.

In addition, to facilitate further settlement discussions, the Parties further stipulate and request that:

(a) all discovery is stayed until August 11, 2014, after which the Parties may not serve new written discovery on each other without mutual agreement or order of the Court; and

(b) the filing of a briefing schedule stipulation and the further briefing ordered by Magistrate Judge Spero in his May 29, 2014 and June 17, 2014 Orders on TPI's Motion for Sanctions be stayed until August 11, 2014, after which date the Parties shall file within eleven days a briefing schedule stipulation.

SO STIPULATED.

DATED: June 20, 2014

THE BUSINESS LITIGATION GROUP, P.C.

By: /s/ Marc N. Bernstein

MARC N. BERNSTEIN  
WILL B. FITTON

Attorneys for Defendant  
KEUN TAEK PARK

DATED: June 20, 2014

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Danielle Ochs

DANIELLE OCHS  
BECKI D. GRAHAM

Attorneys for Plaintiff  
TOPPAN PHOTOMASKS, INC.

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**ATTESTATION OF CONCURRENCE IN FILING**

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from Danielle Ochs.

DATED: June 20, 2014

THE BUSINESS LITIGATION GROUP, P.C.

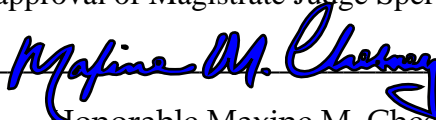
By: /s/ Marc N. Bernstein

Attorneys for Defendant  
KEUN TAEK PARK

**ORDER**

IT IS SO ORDERED, and with the approval of Magistrate Judge Spero.

Dated: June 25, 2014



Honorable Maxine M. Chesney  
United States District Judge

~~IT IS SO ORDERED.~~

~~Dated: \_\_\_\_\_~~

~~Honorable Joseph C. Spero  
United States District Judge~~